

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

In re:

USA GYMNASTICS,¹

Debtor.

Chapter 11

Case No. 18-09108-RLM-11

**ORDER AUTHORIZING THE APPOINTMENT
OF A FUTURE CLAIMANTS' REPRESENTATIVE**

This matter came before the Court on the *Debtor's Motion For Order Authorizing The Appointment Of A Future Claimants' Representative* (the “**Motion**”), filed by USA Gymnastics as debtor and debtor in possession (the “**Debtor**”), for the entry of an order pursuant to sections

¹ The last four digits of the Debtor's federal tax identification number are 7871. The location of the Debtor's principal office is 130 E. Washington Street, Suite 700, Indianapolis, Indiana 46204.

105(a) and 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532; and the Court finds that (i) it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (ii) this matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), (B), and (O); (iii) the relief requested in the Motion is in the best interests of the Debtor, its estate, and creditors; and after due deliberation, and good and sufficient cause appearing therefore, the Court hereby determines that the Motion should be GRANTED.

IT IS HEREBY ORDERED:

1. The Motion is granted as set forth herein.
2. The Court hereby authorizes the appointment of a representative (the “**Future Claimants’ Representative**”) to appear and be heard on behalf of potential sexual abuse claimants who cannot comply with the April 29, 2019 Sexual Abuse Claims Bar Date because they have repressed memories of their abuse, are minors without adequate representation, or have a disability (the “**Future Claimants**”).²
3. The Future Claimants’ Representative shall have the following rights in this chapter 11 case:
 - a. Standing: The Future Claimants’ Representative shall have standing under section 1109(b) of the Bankruptcy Code to be heard as a party in interest in all matters relating to this chapter 11 case on behalf of potential Future Claimants and shall have such powers and duties of a committee, as set forth in section 1103 of the Bankruptcy Code, as are appropriate for a Future Claimants’ Representative; and
 - b. Right to Receive Notices: The Future Claimants’ Representative shall have the right to receive all notices and pleadings that are required to be served upon any statutory committee and its counsel pursuant to applicable law and the *Order Granting Debtor’s Motion For Order Establishing Certain Notice, Case Management, And Administrative Procedures* [Dkt. No. 213].

² Incorporated in this Order are the definitions of “sexual abuse” and “Sexual Abuse Claims Bar Date” that are used in the *Order Approving Debtor’s Motion For Order Establishing Deadlines For Filing Proofs Of Claim And Approving Notice Thereof* [Dkt. No. 301, at ¶¶ 4–5].

4. The appointment of the Future Claimants' Representative is subject to this Court's final approval. The Debtor shall submit a separate application setting forth the Future Claimants' Representative's qualifications and connections, if any, with parties in interest.

5. The terms and conditions of this order shall be immediately effective and enforceable upon its entry.

6. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this order.

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